

EXHIBIT C

Subject: **RE: Peronace (23-3943) Defendant City's Initial Disclosures**
Date: 11/8/2023 11:26:22 AM Eastern Standard Time
From: Irene.Lu@phila.gov
To: jschm47740@aol.com
Cc: Derek.Kane@Phila.gov

I will take the following dates: 11/28, 12/12, 12/15. Can you draft the letter to submit to Chambers?

And regarding your proposal of consenting to a Magistrate Judge: At this point we will decline but can have a further conversation after the decision on my forthcoming 12(b)6 if consent is still of interest to you then.

Best,

Irene Lu, Esq.
Assistant City Solicitor
City of Philadelphia Law Department
Civil Rights Unit
1515 Arch Street, 14th Floor
Philadelphia, PA 19102
215-683-2971 (office)
215-683-5397 (fax)
Irene.Lu@phila.gov

From: Jeff Schmidt <jschm47740@aol.com>
Sent: Monday, November 6, 2023 11:43 AM
To: Irene Lu <Irene.Lu@phila.gov>
Subject: Re: Peronace (23-3943) Defendant City's Initial Disclosures

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My available dep dates will be:

11/14/23, 11/17/23, 11/28/23, 11/29/23, 12/1/23, 12/4/23, 12/5/23, 12/6/23, 12/8/23, 12/12/23, 12/13/23, 12/15/23, 12/18/23, 12/19/23, 12/22/23

Please let me know which of these dates you are able to designate for depositions. Any date which we will designate will be a "hold" date where we do not attach ourselves to other proceedings.

Please let me know as soon as possible,

Jeffrey D. Schmidt, Esquire
Rovner, Allen, Rovner, Zimmerman and Schmidt
175 Bustleton Pike
Feasterville, PA 19053
Phone - (215) 953-2706

In a message dated 10/31/2023 3:09:01 PM Eastern Daylight Time, Irene.Lu@phila.gov writes:

Jeff:

Per Judge Marston's Order of October 13, 2023, attached are our Initial Disclosures for Peronace v. City of Philadelphia (23-3943).

Irene Lu, Esq.

Assistant City Solicitor

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